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*Attorneys for Respondents*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Aracely Pacheco Moran,  
  
Petitioner,  
  
v.

Chad Wolf, Acting Secretary of Homeland  
Security; Matthew T. Albence, Deputy  
Director and Senior Official Performing the  
Duties of the Director for U.S. Immigration  
and Customs Enforcement; Kenneth T.  
Cuccinelli, Senior Official Performing the  
Duties of Director, U.S. Citizenship and  
Immigration Services; Unknown Does  
Defendants 1-100, inclusive,  
  
Respondents.

Case No. 2:20-cv-01316-JAD-EJY

**Stipulation for Extension of Time  
and Proposed Order  
  
(First Request)**

ECF No. 30

Defendants Chad Wolf, Matthew T. Albence and Kenneth T. Cuccinelli  
("Defendants") and Plaintiff Aracely Pacheco Moran ("Plaintiff") hereby stipulate and agree  
that Defendants may have a seven-day extension of time, from November 2, 2020 to  
November 9, 2020, to respond to Plaintiff's Opposition to Defendants' Motion to Dismiss  
Plaintiff's Amended Complaint. (ECF No. 28). This motion is brought pursuant to Federal  
Rule of Civil Procedure 6(b)(1)(A).

An extension is warranted because defense counsel's office is currently short-staffed,  
and the limited staff that is available works part-time from home where computer  
connectivity issues are prevalent. The office also has been inundated with emergency

COVID-19-related motions, and defense counsel is assisting with responding to that litigation. The deadlines in those cases are usually shortened and require prompt action. Under the circumstances, good cause exists to extend the time for Defendants to respond to Plaintiff's Opposition to Defendants' Motion to Dismiss Plaintiff's Amended Complaint. *See* Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the court may, *for good cause*, extend the time...with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires[.]") (emphasis added).

This is Defendants' first request for an extension of time. *See* LR IA 6-1(a) (must advise of previous extensions). Defense counsel contacted Plaintiff's counsel regarding this extension request, and he has advised that he does not oppose the request. This stipulation is made in good faith and not for the purpose of undue delay.

Respectfully submitted this 2nd day of November 2020.

MILLENNIUM LEGAL LLC

/s/ Brian J. Ramsey

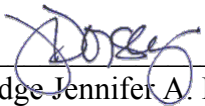
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MILLENNIUM LEGAL LLC  
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NICHOLAS A. TRUTANICH  
United States Attorney

/s/ Holly A. Vance

HOLLY A. VANCE  
Assistant United States Attorney  
*Attorneys for Respondents*

**IT IS SO ORDERED:**

  
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U.S. District Judge Jennifer A. Dorsey  
Dated: November 5, 2020